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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING LETTER REPORT FOR SURFACE SOIL SAMPLING AND
ANALYTICAL RESULTS FOR RESOURCE CONSERVATION AND RECOVERY ACT
DISPLAY AREA NS MAYPORT FL
1/5/1996
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles
Governor

Department of Environmental Protection

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Naval Station Mayport
Administrative Record
09.01.00.0116

Virginia B. Wetherell
Secretary

January 5, 1996

Mr. David Driggers
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 190010
North Charleston, SC. 29419-9010

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RE: Letter Report - Surface Soil and Subsurface Soil Sampling and Analytical Results -
Aircraft Display Area, U.S. Naval Station Mayport

Dear David:

I have reviewed the named letter report dated October 16, 1995 (received October 18, 1995) and offer the following comments which should be addressed:

1. In a letter dated October 19, 1995 to Mr. Joseph Franzmathes, Region IV EPA, M.J. McVann, Acting Staff Civil Engineer, stated that this area was an Area of Concern. I recognize that this letter was written after this report; however, please clarify the status of this area.
2. Since several target analytes were detected in low levels in the surface and subsurface soil samples, please justify why a ground water sample was not obtained. It seems reasonable that the shallow ground water flow would be generally toward the north or northeast; if so, are data available from wells at the existing fuel farm or at SWMU 16 that could be utilized in this regard?
3. There are some relatively minor errors in the document: this includes the FDEP soil cleanup goal (FDEP, September 29, 1995) for pyrene in an industrial scenario (Table 6, page B-6) listed as 47,000,000 ug/kg. The correct value is 41,000,000 ug/kg. Additionally, the FDEP Soil Cleanup Goals for copper (page B-7) are the values for the interim goals; the present goals do not carry a value for copper. Please insert a reference to the interim goals for this value. In Table 8, page B-11, the FDEP Soil Cleanup Goal for benzo(a)pyrene is listed as 140 ug/kg; it is 100 ug/kg. In the recommendations, Bullet No. 5 discusses benzo(a)anthracene - it appears that this should be benzo(a)pyrene.
4. Three analytes (benzo(a)pyrene, arsenic and beryllium) exceeded the FDEP Soil Cleanup Goals and Region III EPA RBCs for surface soil in a residential scenario. Estimated


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human risks related to beryllium concentrations yielded an industrial cancer risk of $2.3E-6$ with an estimated Total Cancer Risk of $1.8E-6$; depending upon additional data from ground water data review or sampling, the Navy may, in addition to further data acquisition or cleanup options, want to consider an industrial deed restriction for this area. I suggest that the Mayport Partnering Team begin discussing options for this area.

Thank you for the opportunity to review this report. I recognize that it is not an evaluation of a named SWMU; however, I think that additional information and consideration is required in order to formulate a recommendation for the area. If you have questions or require further clarification, please contact me at (904) 921-9994.

Sincerely,

James H. Cason, P.G.
Remedial Project Manager

cc: Cheryl Mitchell, NAVSTA Mayport
Martha Berry, EPA Region IV, Atlanta
Pat Kingcade, OGC, FDEP Tallahassee
Terry Hansen, ABB Environmental Services, Tallahassee
Satish Kastury, FDEP, Tallahassee
Brian Cheary, FDEP Northeast District, Jacksonville

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